

**Before the
Federal Communication Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Unbundled Access to Network Elements)	WC Docket No. 04-313
)	
Review of the Section 251 Unbundling)	
Obligations of Incumbent Local Exchange)	
Carriers)	

Tuesday, October 12, 2004 Mark Iannuzzi, President of Telnet Worldwide, Inc and David A. Puskala, President of Superior Technologies, Inc, d/b/a Superior Spectrum, Inc. acting on behalf of the Michigan CLEC Coalition, presented a comprehensive plan for determining impairment in the local telephone market to staff at the FCC. Present were Erin Boone from the Office of Strategic Planning and Policy Analysis, Marcus Maher, Tim Stelzig, Russ Hanser, Carol Simpson, Jeremy Miller, Ian Dillner and Cathy Zima from the Wireline Competition Bureau.

Respectfully Submitted,

David A. Puskala
President
Superior Spectrum, Inc.